

REMARKS

In response to the Office Action mailed on February 25, 2008, Applicant(s) respectfully request(s) reconsideration.

Claims 1-38 and 40 now pending in this Application.

In this Amendment, claims 1, 5, 9, 28, 29, 37, 38 and 40 have been amended and claim 4 has been cancelled.

Claims 1, 9, 28, 29, 37, 38 and 40 are independent claims and the remaining claims are dependent claims. Applicant(s) believe that the claim(s) as presented are in condition for allowance. A notice to this affect is respectfully requested.

Claim 1-38 and 40 were rejected under **35 U.S.C. §102(e)** as being anticipated by U.S. Patent No. 6,920,502 (Araujo et al.). Applicant(s) respectfully disagree(s) with these contentions and assert that the present claimed invention is not anticipated by any disclosure in the Araujo '502 reference.

Araujo '502 teaches a Service Enablement Platform (SEP), apparently as a VPN substitute, that acts as both a bridge between a remote user and applications and as a protocol translator to enable bi-directional web based real time communication between the browser and the applications (col. 7, line 65-col. 8, line 8). In Araujo, the SEP provides protocol translation between the user browser and a protocol employed by the respective application (col. 15, lines 46-57). The present application claims maintaining a session context between a non-session based user device and a session-based application by maintaining a session context. The device maps received messages to the session context to enable a stateful exchange between the user and the application. Araujo, in contrast, teaches an SEP operable for protocol translation between the user and the application, but does not preserve state if there was not state information in the underlying protocol. Rather, Araujo '502 merely translates using whatever state information was already present (col. 17, lines 1-9). Araujo, therefore, neither identifies nor maintains state information, but merely preserves it if present.

The Office Action suggests that Araujo '502 teaches the claimed mapping to the session context at page 17, lines 55-67. The cited IP routing table 330 is a conventional IP routing table and, as such, merely identifies "next hop" routes for a particular destination. As is known in the art, IP, being a sessionless protocol, encapsulates order information in the packet itself, thus the routers need not maintain state information between packets, but merely identify the packet destination from the IP address.

Accordingly, in support of these assertions, claim 1 has been amended with the subject matter of claim 4, and further with subject matter from claim 7, to recite identifying the session context between the session-based application and the device, the session context operative to enable a stateful exchange between the session-based application and the device, and employing the session context for maintaining the sequence of messages between the device and the application, also discussed further in the specification as filed at page 23, lines 6-17.

The Office Action suggests that Araujo '502 anticipates the subject matter of claim 4 at col. 20, lines 35-45 and 22:20-50. Here and elsewhere Araujo '502 describes the protocol conversion discussed above (e.g. RDP to AIP and back, at 22:48-51).

The Office Action suggests that the subject matter of claim 7 is taught by the Araujo file server front end 420 (col. 23:35-65). However, as alluded above, the file server is merely another application, which, as established above, is responsible for maintaining packet state information because the IP protocol does not. The Araujo file server application merely sorts out the received IP packets based on ordering inherent in the IP protocol, as is known in the art.

By way of further distinction, claim 1 has been further amended to clarify that identifying further comprising indexing an identity of the device and a preexisting identity of the application in a session table, as disclosed in the specification at page 24, line 20- page 25, line 8. Nowhere does Araujo show,

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teach, or disclose, alone or in combination, a session table or other respository for indexing an identity of the device to identify the session context.

As such, Araujo '502 does not show , teach or disclose a maintaining state information by identifying the session context between the session-based application and the device, the session context operative to enable a stateful exchange between the session-based application and the device, and employing the session context for maintaining the sequence of messages between the device and the application, as now recited in amended claim 1. Accordingly, amended claim 1 is respectfully submitted as allowable and it is respectfully requested that the rejection under 35 U.S.C. §102(e) be withdrawn.

Claims 9, 28, 29, 37, 38 and 40, rejected on similar grounds, have been likewise amended to recite features similar to those amended into claim 1. As the remaining claims depend, either directly or indirectly, from claims 9, 28, 29,37, 38 and 40, it is respectfully submitted that all claims are now in condition for allowance.

Applicant(s) hereby petition(s) for any extension of time which is required to maintain the pendency of this case. If there is a fee occasioned by this response, including an extension fee, that is not covered by an enclosed check, please charge any deficiency to Deposit Account No. 50-3735.

If the enclosed papers or fees are considered incomplete, the Patent Office is respectfully requested to contact the undersigned collect at (508) 616-9660, in Westborough, Massachusetts.

Respectfully submitted,

/CJL/

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